

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**NANCY DREW SUDERS**  
**Plaintiff**

**v.**

**PENNSYLVANIA STATE POLICE,**  
**Defendant**

:  
:  
: **No. 1:CV-00-1655**  
:  
: **(Judge Rambo)**  
:  
: **(Electronically Filed)**

**DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS**

Defendant Pennsylvania State Police (PSP), by its attorney, Sarah C. Yerger, Senior Deputy Attorney General, requests that prospective jurors be asked the following questions (and any appropriate follow-up questions, in the event that individuals give affirmative answers to initial questions):

1. Do you know any of the attorneys who are involved in this case, or anyone else connected with either the law firm representing plaintiff or the Pennsylvania Office of Attorney General?

2. Have you ever had any contact with any of the people who are expected to testify in this case (list names on witness list)? If so, how do you know the individual? Would that relationship impact upon your ability to render a fair and impartial verdict in this case?

3. Have you or anyone close to you ever worked for the Commonwealth of Pennsylvania, or for any other governmental body, in the past or currently?

4. Have you or anyone close to you ever served in the military or been in the field of law enforcement?

5. Have you or anyone close to you ever been arrested or prosecuted for any type of offense (whether by the Pennsylvania State Police or by any other law enforcement agency)? If so, explain the circumstances. Would that incident have any impact on your ability to render a fair and impartial verdict in this case?

6. Have you, or any member of your family or friends, ever had any problems, negative dealings or encounters with the PSP, the Office of Attorney General or any other law enforcement agency? If so, what was the problem or encounter and how was it resolved? Would that incident affect your ability to render a fair and impartial verdict in this case?

7. Some people believe that just because a suit has been brought, the defendant is probably liable for something. Do you agree with that?

8. Do you believe the fact that a lawsuit is filed means that the person filing the suit is entitled to relief?

9. Have you or anyone close to you had any education, training, or work experience in the field of human resources or personnel management?

10. Have you or anyone close to you ever worked in a supervisory or managerial capacity?

11. Have you or anyone close to you ever felt that one of your superiors (or their superiors) consistently treated you unfairly at work in any way?

12. Have you or anyone close to you ever felt that one of your co-workers (or their co-workers) treated you improperly at work and got away with it?

13. Have you ever felt that a co-worker was being treated unfairly on the job for any reason?

14. Have you or anyone close to you ever experienced any discrimination or harassment on the basis of race, religion, sex, national origin, age, or disability?

15. Have you ever witnessed any type of discrimination or harassment on the basis of race, religion, sex, national origin, age, or disability?

16. Have you or anyone close to you ever filed any kind of employment discrimination charge or grievance or complaint, either in court, or with any agency like the EEOC, or through some kind of employer-sponsored process? If so, what kind of complaint was it and was the outcome? Would that incident have any impact on your ability to render a fair and impartial verdict in this case?

17. Have you, or anyone close to you, ever been accused of discrimination or treating someone else unfairly on account of race, sex, age, ethnic background, religion, or disability?

18. Have you ever read or heard about a situation where you thought that a person who claimed to have been a victim of discrimination actually had no basis for making such a claim?

19. Have you ever been in a situation where you defended or spoke up for someone else who was accused of treating another person in an unfair or discriminatory manner?

20. Do you regard yourself as someone who takes things seriously, follows rules, and doesn't make waves?

21. Have you had any experiences in your life which you think might help you tell the difference between something that amounts to discrimination or harassment, and something that doesn't?

22. Have you ever served on a jury before?

23. Have you ever been involved in a court proceeding before, whether as one of the parties or as a witness or in some other capacity?

24. The plaintiff presents her case first and then the defendant will present his evidence at the close of plaintiff's case. Would you have any

problems refraining from making a decision on any aspect of this case until you have heard both sides- that is, until you have heard all of the evidence?

25. This trial will last between 5 and 7 days. Do you have any problems with serving for that length of time?

26. Would you have any problems putting aside your personal feelings and deciding the case solely upon the evidence and instructions of the judge?

27. Would you have any problems applying the law as instructed by the judge even if you personally disagreed with the law?

28. Is there any reason, mentioned or not, that you could not be totally fair and impartial in this case?

**Respectfully submitted,**

**THOMAS W. CORBETT, JR.**  
**Attorney General**

**BY: s/Sarah C. Yerger**  
**SARAH C. YERGER**  
**Senior Deputy Attorney General**  
**I.D. No. 70357**

**s/Howard G. Hopkirk**  
**HOWARD G. HOPKIRK**  
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**SUSAN J. FORNEY**  
**Chief Deputy Attorney General**  
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**DATED: February 15, 2005**

**IN THE UNITED STATES DISTRICT COURT  
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**NANCY DREW SUDERS**  
**Plaintiff**

**v.**

**ERIC D. EASTON, et al.,**  
**Defendants**

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**CERTIFICATE OF SERVICE**

I, SARAH C. YERGER, Deputy Attorney General, hereby certify that

I have this day served the foregoing via electronic filing to the following:

Donald Bailey, Esquire  
4311 North 6th Street  
Harrisburg, PA 17110

Samuel Stretton, Esquire  
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Harrisburg, PA 17110

s/Sarah C. Yerger  
SARAH C. YERGER  
Senior Deputy Attorney General

DATE: February 15, 2005